

EXHIBIT 1

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Recorder Patty Hansen*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

Mi Famila Vota, et al.,

Plaintiffs,

vs.

Katie Hobbs, in her official capacity as
Arizona Secretary of State, et al.,

Defendants.

NO. CV-22-00509-PHX-SRB
(Consolidated)

**DEFENDANT COCONINO COUNTY
RECORDER'S ANSWERS TO
CONSOLIDATED PLAINTIFFS' FIRST
SET OF INTERROGATORIES**

AND CONSOLIDATED CASES.

**No. CV-22-00519-PHX-SRB
No. CV-22-01003-PHX-SRB
No. CV-22-01124-PHX-SRB
No. CV-22-01369-PHX-SRB
No. CV-22-01381-PHX-SRB
No. CV-22-01602-PHX-SRB**

Pursuant to Fed. R. Civ. P. 33, Defendant Coconino County Recorder hereby submits the following answers to Consolidated Plaintiffs' First Set of Interrogatories. As discovery in this matter is ongoing, Defendant hereby reserves the right to supplement any and all responses as new information is learned through discovery in this matter.

INTERROGATORY NO. 1:

Identify and describe each way that Your office uses or would use information related to the birthplace of a Voter Registration Applicant—including Applicants for whom you already have DPOC—to verify such person’s eligibility to vote, including but not limited to each way in which a Voter Registration Applicant’s failure to provide their birthplace affects or would affect Your ability to confirm the Voter Registration Applicant’s identity or determine whether that person is eligible to register and vote in Arizona. Your answer should identify by name any witnesses who have or are likely to have knowledge or information related to how such information is or would be used by Your office.

RESPONSE: The Coconino County Recorder does not currently and does not anticipate using birthplace information to verify or confirm Voter Registration Applicant’s identity or eligibility to register and vote in Arizona. Further, the Coconino County Recorder believes this requirement to be in violation of the Civil Rights Act of 1964 (52 U.S.C. § 10101(a)(2)(B), consistent with guidance provided by the Arizona Secretary of State’s Office in December 2022, and unless and until it receives contradictory guidance from the Secretary of State or a court order saying otherwise, it does not intend to require provision of this information to complete voter registration applications.

INTERROGATORY NO. 2:

Identify and describe Your office’s processes and procedures for checking the citizenship or residence address or location of Registered Voters or Voter Registration Applicants both before and after the Challenged Laws were enacted, including but not limited to any Documents and Communications that describe or explain how Your office should determine citizenship and residence address or location of a Registered Voter or Voter Registration Applicant. Your answer should identify by name any witnesses who have or are likely to have knowledge or information related to such agreements, or the relevant information contained in such databases.

RESPONSE: The Coconino County Recorder uses the process and procedures contained in the Elections Procedures Manual (EPM) for processing voter registrations and

1 require keyword searches. In researching documents for RFP #7, the Chief Deputy
2 Recorder searched by names of individuals known to have submitted complaints and by
3 the terms “residence” and “residency” and “challenge.” Those searches dated back to
4 2020. The Recorder’s Office abides by the Arizona State Library’s Records Retention
5 Policies, including those applicable to metadata.

6
7 RESPECTFULLY SUBMITTED this 29th day of June, 2023.

8
9 FLAGSTAFF LAW GROUP

10 BY: /s/Rose M. Winkeler
11 ROSE M. WINKELER
12 *Attorney for the Defendant Coconino*
13 *County Recorder Patty Hansen*
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VERIFICATION

I, Patty Hansen, declare under penalty of perjury that I have read the foregoing
Answers to Plaintiff's First Set of Interrogatories and that the same is true to the best of
my knowledge and belief.


Patty Hansen
Coconino County Recorder

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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2023, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the CM/ECF registrants on record.

/s/Rose M. Winkeler

RACHEL H. MITCHELL
MARICOPA COUNTY ATTORNEY

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Mi Familia Vota, et al.,

Plaintiffs,

vs.

Katie Hobbs, in her official capacity as
Arizona Secretary of State, et al.,

Defendants.

AND CONSOLIDATED CASES

No. 22-CV-00509-SRB

**DEFENDANT MARICOPA COUNTY
RECORDER STEPHEN RICHER'S
RESPONSES TO CONSOLIDATED
PLAINTIFFS' FIRST SET OF
INTERROGATORIES**

No. CV-22-00519-PHX-SRB
No. CV-22-01003-PHX-SRB
No. CV-22-01124-PHX-SRB
No. CV-22-01369-PHX-SRB
No. CV-22-01381-PHX-SRB
No. CV-22-01602-PHX-SRB
No. CV-22-01901-PHX-SRB

Defendant Maricopa County Recorder Stephen Richer ("the Maricopa County Recorder" or "Recorder Richer") hereby submits his Response to Consolidated Plaintiffs' First Set of Interrogatories pursuant to Fed. R. Civ. P. 33. Recorder Richer reserves the right

6. The Maricopa County Recorder objects to the First Set of Interrogatories to the extent the Definitions and Instructions therein attempt to impose obligations on the defendant beyond the scope of the federal discovery rules.

RESPONSE: Recorder Richer objects to the request as it is vague and ambiguous. Recorder Richer further objects to the request as it is compound and seeks more than one category of information. Recorder Richer objects to the request to the extent that it seeks confidential or privileged information, including information covered under attorney-client privilege, work product privilege, or the deliberative process privilege.

Notwithstanding and without waiving these objections, birthplace is currently an optional field and does not impact a voter's registration and voting eligibility. If a voter provides his or her birthplace, the birthplace is added to their voter record and can be utilized as Personal Identifying Information ("PII") to aid the Maricopa County Recorder's Office

1 in identifying the voter over the phone should the voter contact the Maricopa County
2 Recorder's Office seeking information about their voter record. However, birthplace is not
3 required and does not impact the voter's ability to register or cast a ballot.
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5 Janine Petty has knowledge or information related to how such information is or
6 would be used by the Maricopa County Recorder's Office.
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8 **INTERROGATORY NO. 2:** Identify and describe Your office's processes and procedures
9 for checking the citizenship or residence address or location of Registered Voters or Voter
10 Registration Applicants both before and after the Challenged Laws were enacted, including
11 but not limited to any Documents and Communications that describe or explain how Your
12 office should determine citizenship and residence address or location of a Registered Voter
13 or Voter Registration Applicant. Your answer should identify by name any witnesses who
14 have or are likely to have knowledge or information related to such agreements, or the
15 relevant information contained in such databases.
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18 **RESPONSE:** Recorder Richer objects to the request to the extent that it seeks
19 confidential or privileged information, including attorney-client privilege, work product
20 privilege, and deliberative process privilege. Recorder Richer further objects to the request
21 as extremely compound as it seeks several categories of information that should be broken
22 into several discrete subparts.
23

24 Notwithstanding and without waiving these objections, the Maricopa County
25 Recorder's Office has not yet implemented the Challenged Laws. Currently, the Maricopa
26 County Recorder's Office checks proof of citizenship and residential address information
27 according to the 2019 Elections Procedure Manual ("EPM") and prior and/or existing state
28

1 into discrete subparts. Recorder Richer further objects to the request as overbroad and
 2 disproportional to the needs of the case considering the case importance of the discovery
 3 being sought to resolving the issues and whether the burden to produce the discover
 4 outweighs its likely benefit.

6 Notwithstanding and without waiving these objections, the Maricopa County
 7 Recorder's Office has an efficient and statutorily compliant voter registration system that
 8 interfaces with AVID – the statewide voter registration system. Maricopa County's voter
 9 registration system is a homegrown system developed and maintained by the County. This
 10 voter registration system interfaces with the AVID system and conforms to the same naming
 11 field conventions. Data is securely imported and exported or manually entered and
 12 replicated to the AVID system.

16 RESPECTFULLY SUBMITTED this 29th day of June 2023.

18 RACHEL H. MITCHELL
 19 MARICOPA COUNTY ATTORNEY

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18 /s/ S.R.

19 S:\CIVIL\CIV\Matters\GN\2022\Mi Familia Vota II v. Hobbs 2022-1062 (22-0509 SRB)\Discovery\Pla to Def\Defendant MC Recorder's
20 Responses\County Recorders Resp to Roggs 060623.docx

VERIFICATION

I, Janine Petty, am the Senior Director of Voter Registration for Maricopa County Recorder Stephen Richer, a Defendant in this matter in his official capacity. I am the person in the Recorder's office who is directly responsible for overseeing voter registration, the subject of the foregoing Interrogatories. I have read the Interrogatories served upon Recorder Richer. The answers to those Interrogatories, provided above, are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Janine Petty", is written over a horizontal line.

Janine Petty
Senior Director of Voter Registration for the
Maricopa County Recorder

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Mi Familia Vota, et al.,

Plaintiffs,

vs.

Adrian Fontes, in his official capacity as
Arizona Secretary of State, et al.,

Defendants.

AND CONSOLIDATED CASES.

Case No. 2:22-cv-00509-SRB
(Lead)

**DEFENDANT SANTA CRUZ
COUNTY RECORDER RESPONSES
TO CONSOLIDATED PLAINTIFFS'
FIRST SET OF INTERROGATORIES**

No. CV-22-00519-PHX-SRB
No. CV-22-01003-PHX-SRB
No. CV-22-01124-PHX-SRB
No. CV-22-01369-PHX-SRB
No. CV-22-01381-PHX-SRB
No. CV-22-01602-PHX-SRB
No. CV-22-01901-PHX-SRB

1 Pursuant to Fed. R. Civ. P. 33, Defendant Santa Cruz County Recorder Anita
2 Moreno (“Moreno”), submits her response and objections to Consolidated Plaintiffs’ First
3 Set of Non-Uniform Interrogatories as follows:

4 **RESPONSES AND OBJECTIONS**
5 **COMMON TO ALL INTERROGATORIES**

6 1. Defendant objects to each request, to the “Definitions,” and to the “Instructions” to
7 the extent that they purport to impose obligations beyond what is required by the Federal
8 Rules of Civil Procedure in responding to discovery requests.

9 2. Defendant objects to each interrogatory to the extent that it calls for the production
10 of documents that are privileged as attorney-client communications, protected as work
11 product, or otherwise not subject to discovery under the Federal Rules of Civil Procedure.

12 3. Defendant objects to each request to the extent that it assumes facts that are not in
13 evidence. By responding to these requests, Defendant does not admit or agree with any
14 explicit or implicit assumption made in the requests.

15 4. Defendant has responded based on her investigation to date and on information
16 currently available to it and reserves the right to supplement these responses.

17 5. The foregoing objections are incorporated by reference into each of Defendant’s
18 responses below. The assertion of the same, similar or additional objections or partial
19 responses to the individual requests does not waive any of the Defendant’s Responses
20 and Objections Common to All Interrogatories.

21 **SPECIFIC RESPONSES AND OBJECTIONS TO INTERROGATORIES**

22 **INTERROGATORY NO. 1:**

23 Identify and describe each way that Your office uses or would use information
24 related to the birthplace of a Voter Registration Applicant—including Applicants for
25 whom you already have DPOC--to verify such person’s eligibility to vote, including but
26 not limited to each way in which a Voter Registration Applicant’s failure to provide their
27 birthplace affects or would affect Your ability to confirm the Voter Registration
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1 Applicant's identity or determine whether that person is eligible to register and vote in
2 Arizona. Your answer should identify by name any witnesses who have or are likely to
3 have knowledge or information related to how such information is or would be used by
4 Your office.

5 **RESPONSE:**

6 **Defendant objects to Interrogatory Number 1 as vague and calls for**
7 **speculation as it relates to how birthplace information may be used to verify voter**
8 **eligibility in the future.**

9 **Subject to and without waiving the foregoing objections, Defendant states**
10 **that she does not use the information related to birthplace information for any**
11 **purpose except to input the information from the voter registration form into the**
12 **voter profile in the Arizona Voter Information Database ("AVID"). Defendant is**
13 **unable to predict future uses but does not anticipate that this procedure will change**
14 **unless different guidance is provided by the Secretary of State.**

15 **The witnesses who have knowledge of how this information is used are as**
16 **follows: Anita Moreno, Yolanda Kory, Rosa Ann Fajardo, Monica Gutierrez, Angel**
17 **Aguilar, Joshua Canchola, Margaret Felix, Rodrigo Robles, Saibet Gastelum,**
18 **Victoria Padilla, Victor Villalobos, Eduvigis Covarrubias, Luis Fierro, Alejandro**
19 **Martinez, and Suzanne Sainz.**

20 **INTERROGATORY NO. 2:**

21 Identify and describe Your office's processes and procedures for checking the
22 citizenship or residence address or location of Registered Voters or Voter Registration
23 Applicants both before and after the Challenged Laws were enacted, including but not
24 limited to any Documents and Communications that describe or explain how Your office
25 should determine citizenship and residence address or location of a Registered Voter or
26 Voter Registration Applicant. Your answer should identify by name any witnesses who
27 have or are likely to have knowledge or information related to such agreements, or the
28 relevant information contained in such databases.

- **None for Request for Production Nos. 10, 11 or 12.**

INTERROGATORY NO. 12:

FOR DEFENDANTS MARICOPA COUNTY RECORDER STEVEN RICHER AND
PIMA COUNTY RECORDER GABRIELLA CÁZARES-KELLY ONLY:

RESPONSE:

Not applicable to Santa Cruz County.

DATED this 29th day of June, 2023.

PIERCE COLEMAN PLLC

By: /s/ Christina Estes-Werther
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County Recorder Anita Moreno

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2023, I transmitted via electronic mail a copy of
the foregoing to all parties, care of their respective counsel.

/s/ Mary Walker

4866-4918-2535, v. 1